

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NANCY W. MILLARD and JAY R.  
MILLARD, wife and husband,

Plaintiffs,

vs.

SAFEWAY, INC., a foreign corporation, and  
TOTAL CLEANING SOLUTIONS, a foreign  
corporation,

Defendants.

Case No.: 2:20-cv-00325-RSL

STIPULATION AND AGREED ORDER  
PERMITTING FILING OF AMENDED  
COMPLAINT AND REMANDING TO  
STATE COURT

The above parties, through their undersigned counsel, hereby stipulate to entry of this Agreed Order permitting Plaintiffs to file an amended complaint adding a new party defendant and remanding the matter back to state court.

The newly identified defendant, TCS Management Services, LLC, is a Washington state limited liability company. Jurisdiction is no longer properly in the above-entitled court based on diversity claims pursuant to 28 U.S.C. § 1441(b)(2). Therefore, remanding back to state court (Snohomish County Superior Court) is proper.

STIPULATION AND ORDER PERMITTING  
FILING OF AMENDED COMPLAINT- 1  
Cause No. 2:20-cv-00325

**BREWE LAYMAN P.S.**  
Attorneys at Law

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2 **BREWE LAYMAN P.S.**  
Attorneys at Law

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4 By /s/ Kenneth E. Brewe  
Kenneth E. Brewe, WSBA 9220  
5 Attorney for Plaintiffs

6 TURNER KUGLER LAW, PLLC

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8 By /s/ John T. Kugler  
John T. Kugler, WSBA # 19960  
9 Attorney for Defendant Safeway

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11 GILBERT LEVY BENNETT, PC

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13 By /s/ Bruce R. Gilbert  
Bruce R. Gilbert, WSBA # 25396  
14 Attorney for Defendant Total Cleaning Solutions, Inc.

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23 STIPULATION AND ORDER PERMITTING  
FILING OF AMENDED COMPLAINT- 2  
24 Cause No. 2:20-cv-00325

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ORDER

THIS MATTER having come on pursuant to the above stipulation of the parties to permit Plaintiffs to file an amended complaint and remanding back to state court, NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

1. Plaintiffs may file an Amended Complaint in the above-captioned matter.
2. This matter is remanded back to the Snohomish County Superior Court.

DONE IN OPEN COURT this 10th day of April, 2020.



JUDGE: Robert S. Lasnik

Presented by:

**BREWE LAYMAN P.S.**  
Attorneys at Law

By /s/ Kenneth E. Brewe  
Kenneth E. Brewe, WSBA 9220  
Attorney for Plaintiffs

Copy Received, Approved for Entry,  
Notice of Presentation Waived:

TURNER KUGLER LAW, PLLC

By /s/ John T. Kugler  
John T. Kugler, WSBA # 19960  
Attorney for Defendant Safeway

STIPULATION AND ORDER PERMITTING  
FILING OF AMENDED COMPLAINT- 3  
Cause No. 2:20-cv-00325

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6 Attorney for Defendant Total Cleaning Solutions, Inc.  
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23 STIPULATION AND ORDER PERMITTING  
24 FILING OF AMENDED COMPLAINT- 4  
Cause No. 2:20-cv-00325

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